

# Proposed 2025 Amendments to Climate and Assurance Standards

## Survey response 86

### Company Name

Skellerup Holdings Limited

### Should AP 4, AP 5, AP 7 and AP 8, which relate to the disclosure and assurance of scope 3 GHG emissions, be extended?

Yes - By two years (the XRB's proposal)

### Please give a reason for your answer

Skellerup Holdings, as a CRE and a business generating more than 80% of its revenue in international markets has found the collection and calculation of scope 3 emissions extremely time-consuming and challenging for our teams across the globe. As a business with operations on four continents and in 7 countries, we have distance, language and systems challenges to overcome. Strategies to address the challenges in accurately capturing this data are being addressed methodically through increased education of our people, the increased use of digital tools and standardisation of reporting platforms. However, these changes do not happen overnight and despite first reporting an estimate of a subset of the Group's scope 3 emissions in our financial year ended 30 June 2024, there is still much work to do to have complete and accurate emissions inventories. Further, the assurance of our scope 1 and 2 emissions during our financial year ended 30 June 2025 showed both the robustness of support that would be required for scope 3 to be assured, and that the NZ assurance providers do not yet have the capability and capacity to provide this assurance to CREs. We therefore support the proposal of a two-year extension to AP4, 5, 7 and 8, which would allow us time to refine our systems and processes, and to report credible and reliable GHG emissions inventory numbers in our financial year ending 30 June 2028.

### Should AP 2, which relates to anticipated financial impacts, be extended?

Yes - By two years (the XRB's proposal)

### Please give a reason for your answer

Skellerup have engaged with several external advisors to assist us in calculating our estimated financial impacts, as the Group does not have the capacity internally to develop these models. Some advisors have been clear that they do not have the knowledge or processes internally to assist with this work stream. Other advisors have recommended simplified models, but acknowledge that thinking in this area is still evolving. We believe that, given the global nature of the Group's business, some reliance will need to be placed on international data, which is still developing and therefore makes the calculation of estimated financial impacts more challenging. Skellerup is therefore supportive of the XRB's proposal of a two-year extension to AP2, which we believe will allow sufficient time for models to be developed in line with international benchmarks. We believe 1 year is too short, as work will need to commence fairly soon in order to meet this. At the end of two years, a reassessment can be made for a further extension, if necessary.

### Any other comments

Skellerup believes that the Group has derived some benefits from some elements of the CRD regime. However, some elements we believe only add cost and compliance to the operation of our business. As a truly global business, our teams in some offshore markets struggle to understand the regime and

its requirements, making the inputs less valuable. Whilst we believe addressing the challenges of climate change are important, we believe an alignment with global frameworks, standards and timelines will be more beneficial to New Zealand businesses.